

Before the
FEDERAL COMMUNICATIONS COMMISSION
 Washington, DC 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of

**2002 BIENNIAL REGULATORY REVIEW OF
 TELECOMMUNICATIONS REGULATIONS WITHIN
 THE PURVIEW OF THE INTERNATIONAL BUREAU**

IB Docket No. 02-309

REPLY COMMENTS OF LORAL SPACE & COMMUNICATIONS LTD.

Loral Space & Communications Ltd. urges the Commission to expeditiously revise section 25.13 l(j) of its rules to eliminate the licensing requirement for receive-only **earth** stations (R/Os) that seek to receive from non-U.S.-licensed earth stations on the Permitted Space Station List. On January 4, 2000, Home Box Office (HBO) filed a Motion for Clarification and Declaratory Ruling in IB Docket No. 96-111, that requested such a rule revision on the grounds that the advent of the Permitted Space Station List application process made the R/Os' licensing requirements unnecessary and duplicative. HBO's Motion remains pending before the Commission. The Satellite Industry Association ("SIA") also supported this rule change in its comments in the Commission's *Secondary Markets* Proceeding¹. Loral and others also supported HBO's request in comments filed in the ongoing ~~Part~~ 25 earth station streamlining proceeding*.

Most recently, New Skies Satellites N.V. filed comments in the above-captioned proceeding with the same objective. New Skies proposed revisions to sections 25.201(b) and 25.231(b) and (j) of the Commission's rules to permit R/Os to operate with non-U.S. licensed satellites on the Permitted Space Station list, without the need for separate R/O

¹ WT Docket No. 00-230, Comments of the Satellite Industry Association, February 9, 2001, pp. 8-9.

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authorizations. New Skies concisely recounts the history of R/Os deregulation and demonstrates that section 25.131(j) is outdated in light of the advent of the DISCO II Permitted Space Station List. Loral agrees with New Skies that “the stated reason for requiring receive-only earth stations to be licensed before communicating with non-U.S. satellites no longer applies to those on the Permitted List.”³

For the reasons cited above, Loral urges the Commission to act soon on the pending requests, cited above, to eliminate the unnecessary, duplicative and inequitable licensing requirements in section 25.131 of its rules for R/Os receiving from non-U.S. licensed satellites on the Permitted Space Station List

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'John P. Stern', written over a horizontal line.

John P. Stern
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² IB Docket No. 00-248, Comments of Loral Space & Communications Ltd., March 26, 2001, pp. 15-16.

³ Comments of New Skies Satellites N.V., October 18, 2002, p. 4.